



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

*271 Cadman Plaza East
Brooklyn, New York 11201*

December 2, 2011

Via ECF and Federal Express

**Re: *United States v. Gustave Drivas, et al.*
Criminal Docket No. 10-771 (S-1) (NG)**

To All Counsel of Record:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the Government is producing the following discovery materials. The Government also reiterates its request for reciprocal discovery.

At the status conference on December 2, 2011, the Government hand-delivered to defense attorneys for six defendants (Shelabadova, Zaretser, Kraiter, Maksim Shelikhov, Kornev and Galper) one copy each of a DVD containing the Medicare billing data related to the three subject clinics, Bay Medical Care PC, SVS Wellcare Medical PLLC and SZS Medical Care PLLC.

Via overnight delivery, the Government is providing copies of the same Medicare billing data DVD to attorneys for the remaining defendants (Drivas, Sergey V. Shelikhov, Zheleznyakov, Kostiochenko and Khandrius).

If counsel have any questions, please do not hesitate to contact either of the undersigned counsel for the Government.

Very truly yours,

LORETTA E. LYNCH
United States Attorney

By: _____/s/_____
Sarah M. Hall
Trial Attorney, Fraud Section
Criminal Division
U.S. Department of Justice
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cc: Clerk of Court (via ECF) (without attachments)

Counsel for Defendants Drivas, Sergey V. Shelikhov,
Zheleznyakov, Kostiochenko and Khandrius (via Federal Express
with attachments)